

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

DARRYL ANDERSON, et. al.,

Plaintiffs,

v.

PERDUE FARMS INC.,

Defendant.

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**CIVIL ACTION NO.
1:06-cv-01000-MEF-WC**

**NOTICE OF FILING ADDITIONAL
NOTICES OF CONSENT TO JOIN**

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, DANIEL E. BATES, HARRY EUGENE SIMMONS, ANNIE KNIGHT and JOHN F. INGRAM, similarly situated employees to Plaintiffs who likewise are or were subjected to the illegal pay practices at issue and who wish to join the above-captioned lawsuit.

Dated: January 18, 2008

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203

(205) 930-6900 (Phone)

(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.
Lance H. Swanner
THE COCHRAN FIRM, P.C.
163 West Main Street
P. O. Box 927
Dothan, AL 36302
(334) 793-1555 (Phone)
(334) 793-8280 (Fax)

– and –

Richard B Celler
MORGAN & MORGAN, P.A.
284 South University Drive
Fort Lauderdale, FL 33324
(954) 318-0268 (Phone)
(954) 333-3515 (Fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2008, I electronically filed the foregoing notice with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Sandra B. Reiss
sandra.reiss@odnss.com

Lance Harrison Swanner
lswanner@cochranfirm.com

James J. Kelley
jkelly@morganlewis.com

Bernard D. Nomberg
bnomberg@cochranfirm.com

Brian Z. Liss
bliss@morganlewis.com

Samuel A. Cherry, Jr.
scherry@cochranfirm.com

/s/ Robert J. Camp

ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Daniel E Bate

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of Plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
12/1/03 to 3/9/05.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 26 day of October, 2007.

Daniel E Bate

[PRINT NAME]

D E Bate

[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Harry Eugene Simmons states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of Plant]
the facility located in Dothan, Alabama. I worked at this location from
[City/State]
9-30-06 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, Alabama, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5th day of November, 2007.

Harry E Simmons
[PRINT NAME]

Harry E Simmons
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Annie Knight
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by PERDUE at the facility located in DOTHAN ALA. I worked at this location from 1989 to 2007.
[Name of Plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the PERDUE plant in DOTHAN ALA, and possibly other plants owned by PERDUE. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 6 day of November 2007.

Annie P Knight
[PRINT NAME]

Annie P. Knight
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

John F. Ingram states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farm at
[Name of Plant]
the facility located in Dothan Alb.. I worked at this location from
[City/State]
Dec. 4, 1996 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farm plant in Dothan Alb., and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farm. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 30 day of October, 2007.

John F. Ingram
[PRINT NAME]

John F. Ingram
[SIGN NAME]